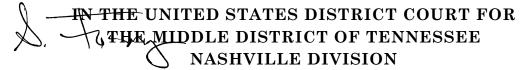
MOTION GRANTED. The Initial Case Management Conference is hereby reset to January 6, 2025 at 8:30 a.m. via telephone. All parties shall call 1-855-244-8681, and when prompted for the access code, enter 23139129180# to participate. If a party has difficulty connecting to the call or has been on hold for more than five (5) minutes, please call 615-736-7344.





JOSHUA MADRID and SARAH PANTER, Individually and Next Friend of Their Minor Child, P.M.
Plaintiffs

vs.

NO. 3:24-CV-01060

UNITED STATES OF AMERICA,

Defendant

PLAINTIFFS' MOTION FOR CONTINUANCE

COME NOW Plaintiffs Joshua Madrid and Sarah Panter, Individually and as Next Friend of Their Minor Child, P.M. and file this Motion for Continuance and in support thereof would respectfully show this Honorable Court the following:

This is a medical negligence case under the Federal Tort Claims Act. The only defendant in the case is the United States of America. Plaintiffs filed their Original Complaint on August 30, 2024 and their First Amended Complaint on September 13, 2024. The Summons was issued on September 16, 2024, making the deadline for the United States to answer November 15, 2024. However, the initial case management conference is currently scheduled for November 7, 2024 at 9:30 A.M. (see Document 5), the week before the United States must file an answer.

As such, Plaintiffs request a continuance of the November 7, 2024 setting, with the case being reset for the initial case management conference after the United States has appeared and responded to the case.

This request for continuance is not for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs Joshua Madrid and Sarah Panter, Individually and as Next Friend of Their Minor Child, P.M. respectfully request that the matter be continued from its current setting for the initial case management conference and would further request any and all further relief to which they are justly entitled.

Respectfully Submitted,

/s/ Laurie Higginbotham LAURIE HIGGINBOTHAM lhigginbotham@nationaltriallaw.com Texas State Bar #50511759 Admitted Pro Hac Vice TOM JACOB tjacob@nationaltriallaw.com Texas State Bar #24069981 Admitted Pro Hac Vice STEVEN HASPEL shaspel@nationaltriallaw.com Texas State Bar #24109981 Admitted Pro Hac Vice WHITEHURST, HARKNESS, BREES, CHENG, ALSAFFAR, HIGGINBOTHAM, & JACOB P.L.L.C. 1114 Lost Creek Blvd. Suite 410 Austin, TX 78746 (512) 476-4346 (o)

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Attorneys for Plaintiffs